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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 FOCALPOINT INTERNATIONAL, INC.,

14 Case No.: 2:18-cv-00236-APG-PAL

15 Plaintiff,

16 vs.

17 DOM RUBINO CONSULTING SERVICES,  
18 INC.; and BIZSTRATPLAN, INC.,

19 Defendants.

20 **STIPULATION AND ORDER FOR  
EXTENSION OF TIME FOR DEFENDANTS  
TO FILE A RESPONSE TO PLAINTIFF  
FOCALPOINT INTERNATIONAL, INC.’S  
MOTION TO ENFORCE AGREED UPON  
NEVADA FORUM SELECTION CLAUSE  
AND ENJOIN IMPROPER LAWSUIT IN  
CANADA**

21 **[FIRST REQUEST]**

22 Plaintiff, FocalPoint International, Inc. (“FocalPoint”), by and through its undersigned  
23 counsel of record, and Defendants, Dom Rubino Consulting Services, Inc. and BizStratPlan, Inc.  
24 (“Defendants”) (collectively, the “Parties”), by and through their undersigned counsel of record,  
25 hereby stipulate and agree as follows:

26 1. On March 27, 2018, FocalPoint filed a Motion to Enforce Agreed Upon Nevada  
27 Forum Selection Clause and Enjoin Improper Lawsuit in Canada (“Motion to Enforce”) [ECF  
28 No. 13].

1           2. Defendants' deadline to file a response to FocalPoint's Motion to Enforce is April  
2 10, 2018.

3           3. Due to scheduling conflicts of counsel, FocalPoint and Defendants have stipulated to  
4 allow Defendants additional time to file their response to FocalPoint's Motion to Enforce. This is  
5 the first request for an extension of time of Defendants' April 10, 2018 deadline.

6           The Parties accordingly request an extension for Defendants to file their response to  
7 FocalPoint's Motion to Enforce up to and including **April 17, 2018**.

8           **IT IS SO STIPULATED.**

9           DATED this 3rd day of April, 2018.

10          GREENBERG TRAURIG, LLP

11          /s/ Jacob D. Bundick, Esq.  
12          JACOB D. BUNDICK, ESQ.  
13          Nevada Bar No. 9772  
14          3773 Howard Hughes Parkway, Suite 400 N  
15          Las Vegas, NV 89169

16          *Counsel for Plaintiff*  
17          *FocalPoint International, Inc.*

18          DATED this 3rd day of April, 2018.

19          LEWIS ROCA ROTHGERBER CHRISTIE LLP

20          /s/ Dan R. Waite, Esq.  
21          DAN R. WAITE, ESQ.  
22          Nevada Bar No. 4078  
23          ERIK J. FOLEY, ESQ.  
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27          *Counsel for Defendants Dom Rubino Consulting*  
28          *Services, Inc. and BizStratPlan, Inc.*

29           **IT IS SO ORDERED** this 11th day of April, 2018.

30             
31          UNITED STATES DISTRICT JUDGE /

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of April, 2018, a true and correct copy of the foregoing  
**STIPULATION AND ORDER FOR EXTENSION OF TIME FOR DEFENDANTS TO FILE**  
**A RESPONSE TO PLAINTIFF FOCALPOINT INTERNATIONAL, INC.'S MOTION TO**  
**ENFORCE AGREED UPON NEVADA FORUM SELECTION CLAUSE AND ENJOIN**  
**IMPROPER LAWSUIT IN CANADA [FIRST REQUEST]** was filed electronically via the  
Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's  
CM/ECF system, and parties may access this filing through the Court's CM/ECF system.

/s/ Shayna Noyce

An employee of Greenberg Traurig, LLP

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